

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Suzanne Genereux, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 04-cv-12137 JLT
	)	
American Beryllia Corp., et al.	)	
	)	
Defendants.	)	

**INITIAL DISCLOSURES OF DEFENDANT BRUSH WELLMAN INC**

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and the Court's Discovery Order, defendant Brush Wellman Inc. ("Brush") makes the following disclosures:

A. Witnesses:

Brush identifies the following individuals who are likely to have discoverable information that Brush may use to support its defenses:

1. Each of the plaintiffs.
2. Treating or examining physicians for Suzanne Genereux, including but not limited to:

Dr. Lee Newman  
Dr. Tilak Verma  
Dr. William Corrao  
Dr. James McCormick  
Dr. Greigstone Yearwood  
Dr. David Ashley  
Dr. Richard P. Millman  
Dr. Gary Epler  
Dr. Joseph H. Friedman  
Dr. Beverly Walters  
Dr. Damon (psychiatrist)  
Dr. Gelberman (orthopedist)

Brush has already disclosed medical records subpoenaed from certain of these physicians, and will make supplemental disclosures as additional records are produced.

Mr. Chesmar has knowledge concerning sales by Brush Wellman to Raytheon before 1987 and warnings and information provided to Brush Wellman customers, including Raytheon.

13. Jeff Chomich  
Sales Engineer  
Brush Wellman Inc.

Mr. Chomich has knowledge concerning sales by Brush Wellman to Raytheon and warnings and information provided to Brush Wellman customers, including Raytheon.

Brush reserves the right to add to this list if it becomes aware of other witnesses with discoverable knowledge.

B. Documents:

Documents that relate to the subject matter of this action, may lead to the discovery of admissible evidence, and/or may be used to support Brush's defenses, are contained in the Brush Wellman Document Depository located at 17877 St. Clair Avenue, Cleveland, Ohio 44110, where documents kept by Brush Wellman Inc. in the ordinary course of business have been preserved and are available for inspection and copying. Plaintiffs' counsel already has an index to the depository and a privilege log.

Documents referring or relating to Raytheon can be located in the following boxes of the Depository, and perhaps other boxes as well:

Onsite Elmore boxes: 060-062, 161, 291, 306, 319, 340, 374, 443, 492 and 540  
Offsite Elmore box: 1047  
Onsite Tucson boxes: 033, 038, 040-041, 072, 096, 103, 113  
Offsite Tucson boxes: 001, 002, 015, 018-19, 026, 045, 059-60, 065, 121, 173, 183,  
258, 274-275, 315, 322, 325-26, 349-350, 380, 385, 434, 526,  
613, 634, 657, 664, 681, 694, 696, 743, 769  
Onsite St. Clair boxes: 047, 061, 074, 223, 269, 276-77, 285-86.

C. Computation of Damages:

Brush Wellman has not claimed any damages in this action. However, Brush Wellman reserves the right to supplement this disclosure in the event damages are claimed.

D. Insurance Agreements:

Dated: October \_\_\_\_, 2005

Respectfully submitted,

By: 

Jeffery D. Ubersax

Jones Day

North Point

901 Lakeside Ave.

Cleveland, Ohio 44114-1190

Tel: (216) 586-3939

Fax: (216) 579-0212

Alan M. Spiro

Federal Bar No. 475650

Edwards & Angell, LLP

101 Federal Street

Boston, MA 02110

Tel: (617) 951-2204

Fax: (617) 439-4170

Attorneys for Defendant Brush Wellman Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 31st day of October, 2005, a true and correct copy of the foregoing was served via U.S. mail, first class postage prepaid, upon the following:

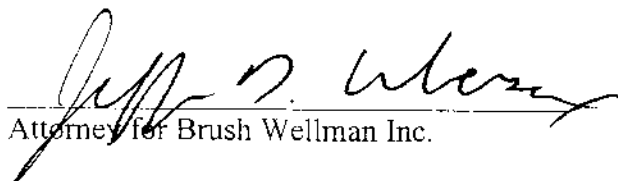
Bradley M. Henry, Esq.  
Meehan, Boyle, Black & Fitzgerald, PC  
Two Center Plaza  
Suite 600  
Boston, MA 02108  
617-523-8300  
Attorneys for Plaintiffs

John C. Wyman, Esq.  
Murtha Cullina, LLP  
20th Floor  
99 High Street  
Boston, MA 02110-2320  
617-457-4041  
Attorney for Defendants Kyocera America, Inc. and  
Kyocera Industrial Ceramics Corp.

Ruben Honik, Esq.  
Stephan Matanovic, Esq.  
Golomb & Honik, P.C.  
121 S. Broad Street, Ninth Floor  
Philadelphia, PA 19107  
Attorneys for Plaintiffs

Robert Nadeau, Esq.  
Nadeau & Associates  
1332 Post Road, Suite 4A  
Wells, Maine 04090  
207-324-3500  
Attorney for Defendant Hardric Laboratories, Inc.

William F. Ahern, Esq.  
Clark, Hunt & Embry  
55 Cambridge Parkway  
Cambridge, MA 02142  
617-494-1920  
Attorney for Defendant American Beryllia  
Corp.

  
Attorney for Brush Wellman Inc.